

microprocessor and the data memory; and a first electrical connector coupled to the microprocessor, the data memory and the data display; and

b) an input component, comprising a cartridge having an outer surface, a data input element on the outer surface of the cartridge; and a communications interface within the cartridge; wherein the cartridge comprises a second electrical connector, and which input component is matedly and removably attachable to the display component via the first electrical connector such that when the first electrical connector is attached to the second electrical connector, the outer surface of the input component is juxtaposed to the exterior surface of the display component *such that an outermost edge of the outer surface of the input component conforms to an outermost edge of the exterior surface of the display component*, wherein both the data input element and the communications interface are electrically connected to the microprocessor, and wherein the data input element is capable of inputting data into the microprocessor and the communications interface is capable of transmitting data between the microprocessor and a telecommunications network.

The Examiner cites Ha for teaching a device having a display component, a data memory, and a data display, which are coupled to a microprocessor and an electrical connector. The Examiner agrees that Ha fails to teach a cartridge-type input device, and a communication interface. Thus, in an attempt to fill these voids, the Examiner cites Glover for disclosing a cartridge-type input device and a wireless modem component. However, while these features may be taught by Glover, it is submitted that one skilled in the art would not have been inspired to combine these references in an effort to formulate the presently claimed invention. In addition, Applicants submit that the present claims would still fail to be obviated in view of the presently cited art.

Ha relates to a game pad which is slidably attachable to a portable gaming device. As shown in FIG.1 of Ha, their game pad 10 has two handles 11 for joystick-like control during gaming applications. In contrast, Glover relates to a cartridge-type *keyboard* without any such handles. Thus, it would not have been obvious for one skilled in the art

to combine the gaming device game pad of Ha with the keyboard of Glover in an effort to devise the present claims, since one would have to completely *redesign* the game pad of the Ha reference by *removing* the handles 11.

In addition, Applicants further assert that both Ha and Glover fail to teach an input device which is juxtaposed to the exterior surface of their portable gaming device *such that an outermost edge of the outer surface of the input device conforms to an outermost edge of the exterior surface of the gaming device*. As shown in FIG.1 of Ha, their attachable game pad 10 has a mounting portion 13 which a gaming device 30 is *slid into*, in order to connect via serial connector 33. Thus, Ha does not show their game pad as having an *outer surface with an outermost edge* which conforms to an outermost edge of the exterior surface of their gaming device 30. Rather, their gaming device is in contact with an *inner* surface of their mounting portion 13. Likewise, Glover states in their disclosure that their PDA 16 is "slid-into" a slot or opening in their housing. This is shown in their FIG.2 wherein a PDA 16 is clearly attached by sliding it into their sleeve-like keyboard device 18. Thus, Glover clearly does not show their keyboard 18 as having an *outer surface with an outermost edge* which conforms to an outermost edge of the exterior surface of a PDA. Rather, their PDA 16 is in contact with an *inner* surface of their keyboard device 18.

The Examiner agrees that Ha and Glover both fail to teach this feature of the present claims. Thus, the Examiner further cites Solomon in an attempt to fill this void. Applicants respectfully disagree. Again, as stated above, it would not have been obvious for one skilled in the art to combine Ha and Glover in the first place. Regarding Solomon, this reference relates to an input device comprising an alphanumeric keyboard and a PDA cradle, for docking a PDA therein. The Examiner points to FIG.16 and paragraphs 55 and 10 of Solomon, stating that this reference discloses a keyboard cartridge where the outermost edge of the outer surface of the input component conforms to an outermost edge of the exterior surface of the display component. Applicants strongly disagree. Fig.16, as described in paragraph 55 of Solomon, shows a keyboard 20 which is docked to a PDA 10 such that it covers *none of the buttons* of the PDA. Still,

nothing in this paragraph requires or even mentions that no overlap exists at all between the PDA and the keyboard. Applicants urge this embodiment clearly describes and shows, in the rudimentary sketch of Fig.16, a PDA which is inserted into a cradle-like keyboard such that the keyboard does not cover any of the PDA's *keys*. However, nothing in Solomon states that a cradle-free cartridge must present in this embodiment. A cradle may still be present and overlap with a portion of the PDA, as long as none of the buttons are covered by the keyboard. Thus, it is urged that this embodiment of Solomon does not provide an input device which is juxtaposed to the exterior surface of their PDA such that an *outermost edge of the outer surface of the input device conforms to an outermost edge of the exterior surface of the display component (PDA)*.

Regarding paragraph 10, Solomon clearly states that their keyboard comprises two components: an alphanumeric keyboard, and a PDA cradle. This paragraph goes on to state that the keyboard may dock *below* the PDA and substantially coplanar with the PDA, and that the PDA may be docked on the keyboard and not in a bay or recess. Applicants urge that these statements of paragraph 10 do not *in any way exclude* the presence of a PDA cradle, or require a structure which does not have a PDA cradle, bay, or recess. The only requirement is that the PDA itself is not docked within the bay or recess. Furthermore, nothing in Solomon requires there to be *no overlap* between their input device and the PDA's buttons or screen in this embodiment. That is, the keyboard may be coplanar with the PDA but still include a portion that overlaps with the PDA, as long as the PDA is not docked within a bay or recess.

In addition, it is urged that each and every one of Solomon's claims fails to obviate the presently claimed invention. Specifically, claims 1-16 and 21-22 each relate to a structure requiring a PDA cradle. Claim 17 does not recite any structural features of a keyboard except for the arrangement of keys. Claim 18 relates to a keyboard which covers a lower portion of the PDA. Claim 19-20 relates to a lock mechanism for a PDA docking bay.

As stated above, none of the cited references teach or suggest the inventive two-component device wherein, when the first electrical connector is attached to the second electrical connector, the outer surface of the input component is juxtaposed to the exterior surface of the display component such that an outermost edge of the outer surface of the input component conforms to an outermost edge of the exterior surface of the display component. It is urged that one skilled in the art would not have been inspired to formulate the presently claimed invention upon a combining of these three references. Thus it is respectfully requested that the present 35 U.S.C. 103 rejection be withdrawn.

2) The Examiner has further rejected claims 5 and 20 under 35 U.S.C. 103 over Ha in view of Glover and Solomon, and in further view of Glad. It is respectfully submitted that this ground of rejection has been overcome.

The Examiner takes the position that a combination of Ha, Glover, and Solomon teaches every feature of the present claims, except for a touch screen. Thus, the Examiner cites Glad for teaching a device having a touchpad keyboard. While this feature is taught by Glad, Applicants urge that a combination of these four references *still* fails to obviate the present claims.

The arguments against Ha, Glover, and Solomon are repeated from above and apply equally here. Specifically, it is urged that *none* of the cited references teach or suggest an input device which is juxtaposed to the exterior surface of a display component *such that an outermost edge of the outer surface of the input device conforms to an outermost edge of the exterior surface of the display component*. Furthermore, it is urged that one skilled in the art would not have been inspired to combine the teachings of Ha with those of Glover or Solomon. Again, Ha relates to a game pad for attachment to a portable gaming device having two handles for joystick-like control during gaming applications. In contrast, Glover and Solomon specifically relate to *keyboards* for use with personal digital assistants. Thus, it would not have been obvious for one skilled in the art to redesign the gaming device game pad of Ha to conform to the keyboards of Glover and Solomon in an effort to devise the present claims.

Regarding Glad, this reference discloses an attachable portable touchpad keyboard for attachment to a PDA device or the like. First, Applicants wish to point out that Glad's touchpad fails to include a second electrical connector as required by the present claims. Instead, Glad uses an external adaptor 12 which is *separate* from each of their touchpad 14 and their PDA 20, which adaptor is used to connect these two components. Furthermore, as shown in Glad's FIGS. 7 and 8, and particularly FIG. 11, a portion of the adaptor 12 is to be inserted within the touchpad, and a portion of the adaptor 12 is to be inserted into the PDA. However, a portion of the adaptor 12 will remain in place *in between* the touchpad and the PDA, thereby preventing the outer surface of the touchpad from being juxtaposed to the exterior surface of the PDA, as presently required. Still further, as shown in Glad's FIG. 6 and 7, the adaptor 12 is *angled* such that when the touchpad 14 and the PDA device 20 are attached via the adaptor 12, the touchpad 14 is *tilted* towards the PDA 20. As stated in Glad, this serves to form an angle of *less than 180 degrees* between the touchpad 14 and the PDA 20. Applicants submit that this teaches away from the present claims, since Glad *does not show* at an outermost edge of the outer surface of the touch pad as conforming to an outermost edge of the exterior surface of the PDA. Instead, as shown in Glad's FIG. 6, the bottom of their PDA 20 is awkwardly situated adjacent to a *top corner* of the touchpad 14, and must be supported by support legs 16, 18, and 28.

For the above reasons, it is respectfully urged that the present claims fail to be obviated by a hypothetical combination of Ha, Glover, Solomon, and Glad. In addition, the mere fact that four separate references have been combined to support the examiner's finding of obviousness is, in itself, an indication of non-obviousness. Thus, it is respectfully requested that this rejection be withdrawn.

3) The Examiner has rejected claims 9-12 and 14 under 35 U.S.C. 103 over Solomon in view of Glover. The Examiner asserts that one skilled in the art would have been inspired to devise the present invention upon a combined reading of these references. Applicants respectfully submit that this ground of rejection has been overcome.

The arguments against Solomon and Glover are repeated from above and apply equally here. It is again urged that neither reference teaches or suggests an input device which is juxtaposed to the exterior surface of a display component *such that an outermost edge of the outer surface of the input device conforms to an outermost edge of the exterior surface of the display component*. Applicants therefore submit that one skilled in the art would not have been motivated to create the presently claimed invention upon a review of two references which each lack this key feature. Thus, it is respectfully requested that the 35 U.S.C. 103 rejection be withdrawn in view of the above arguments.

4) The Examiner has rejected claim 13 under 35 U.S.C. 103 over Solomon in view of Glover and in further view of Glad. The Examiner asserts a combination of Solomon and Glover teaches each feature of the present claims, except for a touch screen. Thus, the Examiner cites Glad for teaching a device having a touchpad keyboard. Applicants respectfully submit that such a combination would *still* fail to obviate the present claims.

The arguments against Solomon and Glover are repeated from above and apply equally here. For the reasons stated above, it is urged that neither reference teaches or suggests an input device which is juxtaposed to the exterior surface of a display component *such that an outermost edge of the outer surface of the input device conforms to an outermost edge of the exterior surface of the display component*.

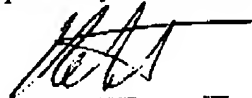
Regarding Glad, it is again urged that this reference fails to teach several key features of the present invention. First, their touchpad fails to include a second electrical connector as required by the present claims. Instead, they use a *separate* external adaptor 12 to connect their touchpad to a PDA. Furthermore, as shown in Glad's FIGS. 7 and 8, and particularly FIG. 11, a portion of the adaptor 12 will remain in place *in between* the touchpad and the PDA when interconnected, thereby preventing the outer surface of the touchpad from being juxtaposed to the exterior surface of the PDA, as presently required. Still further, as shown in Glad's FIG. 6 and 7, the adaptor 12 is *angled* such that the touchpad 14 is *tilted* towards the PDA 20 at an angle of *less than 180 degrees* when

connected. Thus, Glad teaches away from the present claims, since they *do not show* at an outermost edge of the outer surface of the touch pad as conforming to an outermost edge of the exterior surface of the PDA. Rather, as shown in Glad's FIG.6, the bottom of their PDA 20 is awkwardly situated adjacent to a *top corner* of the touchpad 14, and must be supported by support legs 16, 18, and 28.

Applicants therefore submit that one skilled in the art would not have been motivated to create the presently claimed invention upon a review of two references which each fail to teach key features of the present claims. Thus, in view of the above arguments, it is respectfully requested that the 35 U.S.C. 103 rejection be withdrawn.

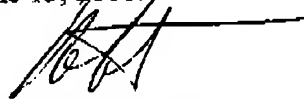
The undersigned respectfully requests re-examination of this application and believes it is now in condition for allowance. Such action is requested. If the examiner believes there is any matter which prevents allowance of the present application, it is requested that the undersigned be contacted to arrange for an interview which may expedite prosecution.

Respectfully submitted,



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I hereby certify that this paper is being facsimile transmitted to the Patent and Trademark Office (FAX No. 571-273-8300) on June 15, 2006.



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